

184327

C. DUKES SCOTT
EXECUTIVE DIRECTOR

1111 Main Street, Suite 300
Columbia, SC 29201



DAN E ARNETT
CHIEF OF STAFF

Main Line: 803-737-0300
Legal Department: 803-737-0377

VIA U.S. MAIL

February 1, 2007

FLORENCE P. BELSER
GENERAL COUNSEL

S. C. PUBLIC SERVICE COMMISSION
RECEIVE

FEB 05 2007

Patrick W. Turner, Esquire
BellSouth Telecommunications, Incorporated
P.O. Box 752
Columbia, SC, 29202

Re: dPi Teleconnect, LLC, Complainant/Petitioner v. BellSouth Telecommunications,
Incorporated, Defendant/Respondent
Docket No. 2005-358-C

Dear Mr. Turner:

Please find enclosed and served on you the Office of Regulatory Staff's First Continuing Data Requests in the above referenced matter. Please let me know if you have any questions.

Sincerely,

Nanette S. Edwards

NSE/pjm

Enclosure

cc: Charles L.A. Terreni, Esquire (w/encl)

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-358-C

IN RE: dpi Teleconnect, LLC, Complainant/)	OFFICE OF REGULATORY
Petitioner v. BellSouth)	STAFF'S FIRST CONTINUING
Telecommunications Inc., Defendant/)	DATA REQUEST
Respondent)	

TO: Patrick W. Turner, Counsel for BellSouth Telecommunications, Inc. :

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2005), the Office of Regulatory Staff hereby serves the following Data Requests upon BellSouth Telecommunications, Inc., (hereafter referred to as "BellSouth").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy

of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

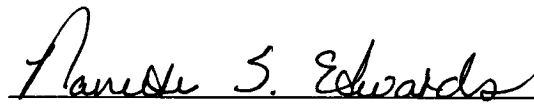
- I. That all information requested below, unless otherwise specified, shall be limited to BellSouth's proposed South Carolina operations.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to James McDaniel, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.
- IX. That BellSouth provides six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that BellSouth provides an electronic version of the responses.

- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of BellSouth's responses, the BellSouth witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require BellSouth to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

REQUESTS:

- 1.1 Provide ORS with a copy of all discovery responses served by BellSouth to any other party in this docket.
- 1.2 Please provide ORS with a copy of the "BellSouth submissions" referenced in BellSouth's response to DPI request Item No. 1-1.

February 1, 2007



Nanette S. Edwards, Deputy General Counsel
Office of Regulatory Staff
1441 Main Street, Suite 300
P.O. Box 11263
Columbia, South Carolina 29211
(803) 737-0575
nsedwar@regstaff.sc.gov

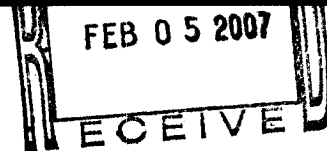
C. DUKES SCOTT
EXECUTIVE DIRECTOR

1111 Main Street, Suite 300
Columbia, SC 29201



Main Line: 803-737-0800
Legal Department: 803-737-0877

DAN E. ARNETT
COMPTROLLER OF STATE



VIA U.S. MAIL

FLORENCE P. BELSER
GENERAL COUNSEL

February 1, 2007

John J. Pringle, Esquire
Ellis Lawhorne & Sims, P.A.
1501 Main Street, 5th Floor
Columbia, SC 29201

Re: dPi Teleconnect, LLC, Complainant/Petitioner v. BellSouth Telecommunications,
Incorporated, Defendant/Respondent
Docket No. 2005-358-C

Dear Mr. Pringle:

Please find enclosed and served on you the Office of Regulatory Staff's First Continuing Data Requests in the above referenced matter. Please let me know if you have any questions.

Sincerely,

Nanette S. Edwards

NSE/pjm

Enclosure

cc: Charles L.A. Terreni, Esquire (w/encl)

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2005-358-C

IN RE: dpi Teleconnect, LLC, Complainant/)	OFFICE OF REGULATORY
Petitioner v. BellSouth)	STAFF'S FIRST CONTINUING
Telecommunications Inc., Defendant/)	DATA REQUEST
Respondent)	

TO: John J. Pringle, Jr., Counsel for dpi Teleconnect, LLC:

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2005), the Office of Regulatory Staff hereby serves the following Data Requests upon dpi Teleconnect, LLC, (hereafter referred to as "DPI").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy

of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information requested below, unless otherwise specified, shall be limited to DPI's proposed South Carolina operations.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to James McDaniel, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.
- IX. That dpi provides six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that dpi provides an electronic version of the responses.

- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of DPI's responses, the DPI witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require dpi to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

REQUESTS:

- 1.1 Provide ORS with a copy of all discovery responses served by DPI to any other party in this docket.

February 1, 2007



Nanette S. Edwards, Deputy General Counsel

Office of Regulatory Staff

1441 Main Street, Suite 300

P.O. Box 11263

Columbia, South Carolina 29211

(803) 737-0575

nsedwar@regstaff.sc.gov